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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of )

Implementation of the Pay Telephone )  
Reclassification and Compensation )  
Provisions of the Telecommunications )  
Act of 1996 )

CC Docket No. 96-128

**MOTION OF THE AMERICAN PUBLIC COMMUNICATIONS  
COUNCIL AND THE INMATE CALLING SERVICE PROVIDERS  
COALITION TO EXTEND PAGE LIMIT FOR CONSOLIDATED REPLY**

Albert H. Kramer  
Robert F. Aldrich  
David M. Janas  
DICKSTEIN SHAPIRO MORIN  
& OSHINSKY LLP  
2101 L Street, N.W.  
Washington, D.C. 20037-1526  
(202) 785-9700

Attorneys for the American Public  
Communications Council and the  
Inmate Calling Service Providers Coalition

July 10, 1997

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Pursuant to Section 1.41 of the Commission's Rules, 47 C.F.R. § 1.41, the American Public Communications Council ("APCC") and the Inmate Calling Service Providers Coalition (the "ICSPC") hereby move for leave (1) to file consolidated replies to oppositions to their applications for review of the Common Carrier Bureau's April 15, 1997 Orders on the Comparably Efficient Interconnection ("CEI") Plans of Ameritech, Bell Atlantic Telephone Companies ("Bell Atlantic"), BellSouth Corporation ("BellSouth"), NYNEX Telephone Companies ("NYNEX"), Pacific Bell and Nevada Bell (jointly, "PacTel"), Southwestern Bell Telephone Company ("SWBT") and U S West, Inc. ("U S West"),<sup>1</sup> and (2) to exceed, if necessary, the 5-page limit for replies, 47 C.F.R. § 1.15(f)(1).

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<sup>1</sup> See Ameritech's Plan to Provide Comparably Efficient Interconnection to Providers of Pay Telephone Services, Implementation of the Pay Telephone Reclassification  
(Footnote continued)

On May 5, APCC and ICSPC requested and were granted leave to each file a consolidated application for review addressing all seven (7) of the CEI Orders.<sup>2</sup> In the course of preparing their respective replies to oppositions to the consolidated applications for review, counsel for APCC and ICSPC have realized that a similar request for consolidated replies was not included in their earlier request.

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(Footnote continued)

and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-790, Released April 15, 1997 (CCB) ("Ameritech CEI Order"); Bell Atlantic Telephone Companies' Comparably Efficient Interconnection Plan for the Provision of Basic Payphone Services, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-791, Released April 15, 1997 (CCB) ("Bell Atlantic CEI Order"); BellSouth Corporation's Offer of Comparably Efficient Interconnection to Payphone Service Providers, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-792, Released April 15, 1997 (CCB) ("BellSouth CEI Order"); The NYNEX Telephone Companies' Offer of Comparably Efficient Interconnection to Payphone Service Providers, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-793, Released April 15, 1997 (CCB) ("NYNEX CEI Order"); Pacific Bell and Nevada Bell Comparably Efficient Interconnection Plan for the Provision of Basic Telephone Service, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-794, Released April 15, 1997 (CCB) ("PacTel CEI Order"); Southwestern Bell Telephone Company's Comparably Efficient Interconnection Plan for the Provision of Basic Payphone Services, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-795, Released April 15, 1997 (CCB) ("SWBT CEI Order"); U S West's Comparably Efficient Interconnection Plan for Payphone Services, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-796, Released April 15, 1997 (CCB) ("U S West CEI Order"). The Ameritech CEI Order, Bell Atlantic CEI Order, BellSouth CEI Order, NYNEX CEI Order, PacTel CEI Order, SWBT CEI Order and U S West CEI Order are referred to collectively herein as "CEI Orders."

<sup>2</sup> Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-1024 (rel. May 14, 1997) (PP) ("May 14 Order").

Therefore, APCC and ICSPC respectfully request that, in accordance with the May 14 Order, the Commission allow APCC and ICSPC to file consolidated replies, with each party's consolidated reply not to exceed a maximum of 15 pages.

When granting the May 5 motion, the Policy and Program Planning Division found that the Bureau's CEI Orders raise common legal issues that would most efficiently be addressed in a consolidated fashion, and that granting the motion would eliminate the need for duplicative pleadings, and conserve Commission resources. May 14 Order at 2-3. Furthermore, the Policy and Program Planning Division found "that there are certain factual variations among the seven CEI Orders," and thus the parties might not be able to address adequately the factual issues if the parties' applications were limited to 25 pages. Id. at 3. Thus, the page limit for each consolidated application was extended to 50 pages. Id.

Likewise, because of the recognized factual variations among the individual CEI Orders, APCC and ICSPC cannot adequately address the issues raised in opposition to their applications for review<sup>3</sup> if their respective consolidated replies are limited to 5 pages. APCC and ICSPC each intends to avoid unnecessarily lengthening its filing. In no event will either party require more than 15 pages for its individual reply supporting its application for review of the CEI Orders.

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<sup>3</sup> Oppositions were filed by the RBOC Coalition and Ameritech, and comments were filed by AT&T.

Accordingly, the Commission should grant the request of APCC and ICSPC to extend the page limit for each consolidated reply to a maximum of 15 pages.

Dated: July 10, 1997

Respectfully submitted,

*Robert F. Aldrich / By DMJ*

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Albert H. Kramer  
Robert F. Aldrich  
David M. Janas  
DICKSTEIN SHAPIRO MORIN  
& OSHINSKY LLP  
2101 L Street, N.W.  
Washington, D.C. 20037-1526  
(202) 785-9700

Attorneys for the American Public  
Communications Council and the  
Inmate Calling Service Providers Coalition

**Certificate of Service**

I hereby certify that on July 10, 1997, a copy of the foregoing Motion of the American Public Communications Council and the Inmate Calling Service Providers Coalition to Extend Page Limit for Consolidated Reply was sent by overnight courier and facsimile to the following:

Michael Kellogg\*  
Kellogg Huber Hansen Todd & Evans  
1300 K Street, N.W.  
Suite 1000 West  
Washington, DC 20005  
202-326-7900  
202-326-7999 (FAX)

Frank Michael Panek  
Michael S. Pabian  
Room 4H84  
2000 West Ameritech Center Drive  
Hoffman Estates, IL 60196-1025  
847-248-6044  
847-248-6013 (FAX)

Richard K. Welch, Chief\*  
Policy and Program Planning Division  
Federal Communications Commission  
1919 M Street, N.W.  
Room 544  
Washington, DC 20554

Peter H. Jacoby  
Mark C. Rosenblum  
Richard H. Rubin  
AT&T Corp.  
295 N. Maple Avenue, Room 3252I3  
Basking Ridge, New Jersey 07920  
908-221-4481  
908-953-8360 (FAX)

Janice Myles\*  
Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, N.W., Room 544  
Washington, DC 20554

A. Richard Metzger\*  
Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, N.W., Room 500  
Washington, DC 20554

ITS\*  
1231 20th Street, N.W.  
Suite 102  
Washington, DC 20037

\* By hand-delivery on July 10, 1997



David M. Janas